

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

MADELYN CASILAO, HARRY
LINCUNA, and ALLAN GARCIA, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

HOTELMACHER LLC, dba HOLIDAY
INN EXPRESS; STEAKMACHER, LLC,
dba MONTANA MIKE'S
STEAKHOUSE; SCHUMACHER
INVESTMENTS, LLC, dba WATER
ZOO; APEX USA, INC.; WALTER
SCHUMACHER; and CAROLYN
SCHUMACHER,

Defendants.

Case No.: Case No. 5:17-cv-00800-SLP

**JOINT MOTION FOR ENTRY OF
PROTECTIVE ORDER PURSUANT TO RULE 26(c)**

Plaintiffs Madelyn Casilao, Harry Lincuna, and Allan Garcia, and
Defendants Hotelmacher LLC, Steakmacher, LLC, Schumacher Investments, LLC, Apex
USA, Inc., Walter Schumacher, and Carolyn Schumacher respectfully move this Court to
enter a protective order pursuant to Federal Rule of Civil Procedure 26(c) designating
certain discovery materials as confidential. In support of this motion, the parties state as
follows:

1. The parties and third parties may have confidential or proprietary information within their possession, custody or control that is relevant to the claims and defenses involved in this case.

2. The parties have conferred in good faith about a protective order related to discovery materials and agree to the terms of the proposed order.

3. The proposed Protective Order is being submitted contemporaneously to the Court in accordance with the instructions set forth in Section II.G. of the Electronic Filing for Civil and Criminal Cases Policies & Procedures Manual for the United States District Court, Western District of Oklahoma.

WHEREFORE, the parties respectfully request that this Court enter the proposed Protective Order.

Dated: August 16, 2019

Respectfully Submitted,

/s/ Catherine Fisher
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